4. Using the SS/SSI Reports

This Chapter provides procedures for program administrators to use the SS and SSI Benefit History and Income Discrepancy Reports during the tenant re-certification process. In addition, this Chapter explains requirements for income counted or excluded in determining tenant contributions toward rent.

HUD's *Public Housing Occupancy Guidebook* provides detailed and substantive information on the income components that should be included or excluded in rent calculations. PHAs may access the current version of the guidebook at http://www.hud.gov/offices/pih/index.cfm. Owners and agents may access the Office of Housing's *Occupancy and Requirements of Subsidized Multifamily Housing Programs (Handbook 4350.3 REV-1)* using the HUD resource HUDCLIPS found at http://www.hudclips.org.

A. Introduction

TASS is designed to assist POAs in the re-certification of tenant households, not in the processing of new applications or interim re-certifications. For new applicants seeking to receive rental assistance and for current tenants undergoing interim re-certifications of income, program administrators should request that the individual provide documentation that identifies the monthly amount of SS/SSI benefit they receive from SSA and obtain third-party verification. Acceptable documents include recent benefit letters [the preferred document], award letters, and other letters from SSA that show benefit amounts.

The SS and SSI information provided by the applicant will be verified using the HUD/SSA monthly computer matching process prior to the annual re-certification date.

Note
Program administrators should not request that new applicants go to the local SSA Offices to obtain reports on their SS and SSI benefits. Reports should be requested by calling the SSA at (800) 772-1213 or via the SSA website at www.ssa.gov.

B. Use SS and SSI Reports to Verify Income

Program administrators may rely on the HUD-provided information as sufficient third-party documentation to verify tenant-reported SS/SSI benefits for annual re-certifications of household income. However, the program administrator may request that the tenant provide current SSA benefit letters or other documentation showing changes in income.

Tenants are required to report SS/SSI benefits received and if the program administrator does not receive a Benefit History Report from HUD for a tenant who is due for re-certification, the program administrator may use the tenant-provided information for verification purposes.

If TASS does not provide a Benefit History report for a tenant, this should not be interpreted as confirmation that the tenant or a member of the family does not receive SS/SSI benefits. If you are unable to find a Benefit History Report for the household being re-certified, this may be caused by one of several reasons. The table below describes these reasons:

Table 1. Reasons a Benefit History Report May Not be Available for a Tenant

Reason	Explanation and Suggested Next Steps
The household is not due for re-certification in the selected month	If the user searches by PHA, Project, or Contract, they are required to specify the re-certification month as one of the search criteria. Thus if there is a misunderstanding regarding the month the household is due for re-certification, the household may not be included in the search results. Verify the month the household is due for re-certification and re-do the search. You may also search by household; in which case you will not need to specify the re-certification month. See Appendix IV for directions on searching by household.
No Benefit History Report was generated for the tenant.	To generate the Benefit History Reports, HUD sends to SSA tenant personal identifiers—SSN, name, and date of birth. These are obtained from the data submitted by PHAs on the HUD Form 50058 and by O/As on HUD Form 50059. SSA only sends back benefit information for individuals with complete and matching personal identifiers. A Benefit History Report may be missing for one of the following reasons: 1. The HUD Form 50058/50059 was not submitted to HUD (PIC/TRACS) and thus no benefit information was requested from SSA for the tenant. 2. There was a mismatch on the tenant data submitted to HUD and SSA did not recognize the SSN of the tenant or could not match the SSN to the name or date of birth of the tenant. 3. The tenant's SSN was verified but the tenant does not currently receive benefits and has never received benefits in the past. TASS will generate an Error Report for the last two reasons. Program administrators should review the Error Report and use the Form 50058 or 50059 to correct any errors in personal identifiers that may contribute to non-receipt of future SS/SSI reports from

Reason	Explanation and Suggested Next Steps
	HUD.
The Benefit History Report is no longer available	Benefit History Reports are made available on the TASS Online Secure Systems four months before the families' annual re-certification date. They remain on the system for approximately five months and then they are purged. If the tenant's re-certification occurred over five months ago, no reports will be available on the system.

The following sections describe procedures for verifying SS and SSI income and resolving income discrepancies using the Benefit History Report and the Income Discrepancy Report.

C. Verifying SS/SSI Income with the Benefit History Reports

Benefit History Reports provide SS/SSI benefit information for individuals with matching personal identifiers in HUD's systems (PIC and TRACS) and SSA files. Program administrators will use this information in the annual re-certification process to verify the amount of SS/SSI benefit provided to the tenant and to help determine the amount of rental assistance the tenant is entitled to receive. See Appendices V and VI for a sample Benefit History Report for PHAs and O/As, respectively. See Appendix VII for an explanation of the codes used on the Benefit History Report.

Most households will have one or more Benefit History Reports (one for each individual in the household with SS or SSI income). Where this situation occurs, the program administrator should:

1. Use the Benefit History report to calculate the tenant's projected annual income for the next scheduled re-certification. This will involve annualizing (multiplying by 12 the monthly amounts shown on the Report) the household's benefits to create an accurate estimate of the household's income from these sources for the next 12 months. The following table summarizes the types of benefits included and excluded as income:

Table 2. Types of Income Shown on the Benefit History Report

Types of Income Shown on the Benefit History Report	
Included in Income When Calculating the Tenant's Contribution toward Rent	**Excluded from Income When Calculating the Tenant's Contribution toward Rent**
Social Security[2]	Lump sum social security payments
Dual entitlement for social security (when the Tenant receives an additional electronic payment, usually a benefit received as a beneficiary of another individual)	Social Security provided under a Plan to Attain Self Sufficiency (PASS)
Supplemental Security Income	Third-Party paid Medicare Premium (See Footnote 2)
State supplemental security income	
Black lung benefits[3]	

If there is evidence that a tenant is receiving both Federal and State SSI benefits and the Benefit History Report only provides the Federal SSA amount, the program administrator should indicate both incomes in Section 7b on the Form HUD 50058 or Section 28c on the Form HUD 50059.

2. Discuss the computed amount of included income with the head of household during the annual re-certification of household income. Offer the head of household the opportunity to contest the program administrator's computed income amounts.
3. File the SS and SSI Benefit History Report in the tenant's case file. The reports should be kept in the case file for the period indicated by the POA's record retention policies and procedures.

D. Resolving Tenant Income Discrepancies

The Income Discrepancy Report is generated for households with a discrepancy of at least $50 between the net monthly SS/SSI benefit amount reported by SSA and that reported to HUD by

[2] To obtain the gross amount of benefits, you must add the Net Social Security benefit to the Medicare premium amount. When the Benefit History Report shows the same gross and net benefits AND a Medicare premium, this means a third party (usually the State) is paying the Medicare premium. If the Benefit History Report shows a "Y" under "Buy-In," this indicates another person or organization is paying the Medicare insurance premium.

[3] The Benefit History Report shows only black lung benefits paid by SSA. The resident should provide a benefit verification for any black lung benefits paid by the Department of Labor.

the tenant. The report presents the program administrator with a comparison of the SSA- and tenant-reported amounts and highlights those households requiring investigation to determine if the discrepant amounts represent actual unreported income affecting the families' prior tenant contributions toward rent. Program administrators will receive an SS/SSI Benefit History Report for all tenants listed on the Tenant Income Discrepancy Reports.

See Appendices VIII and IX for a sample Tenant Income Discrepancy Report for PHAs and O/As, respectively. See Appendix X for an explanation of the codes used on the Income Discrepancy Report.

The PIC and TRACS annual amounts have been recalculated to show on the Income Discrepancy Report as monthly amounts. The report always provides the Head of Household name and SSN to aid the program administrator in locating information about the tenant. The SSA amounts shown on the report do not include lump sum distributions because they are not counted as income in computing tenant contributions toward rent.

1. Compare the tenant-reported amount as obtained from PIC and TRACS data to the actual income data used in computing a family's contribution toward rent to ensure the PIC and TRACS data used for the comparison is correct. For example, this analysis may indicate data errors, such as, the tenant reported SS or SSI, but a "0" was erroneously recorded in the SS and SSI data fields. If the analysis indicates the family has previously failed to report all SS and SSI as required by program regulations, proceed to step 2 below. If the analysis indicates the family has properly reported all SS and SSI as required by program regulations, proceed to step 5.
2. Discuss the income discrepancy with the tenant during the normal re-certification process, offering the tenant an opportunity to explain the reasons for the income discrepancy and an opportunity to contest any program administrator findings concerning unreported or under-reported SS and SSI benefits. The initial matching of PIC or TRACS data to SSA's data may identify individuals who have not reported SS and SSI. Sometimes tenants may have unreported SS and SSI for extended periods of time and may owe rent retroactively. If the tenant failed to report all SS and SSI as required, proceed to step 3. If the tenant claims the SS and SSI information is erroneous, the program administrator should request that the tenant do one or more of the following:
    a. Provide additional documentation such as SSA benefit letters, SSA award letters, or other letters from SSA that show benefit amounts;
    b. Call SSA's Benefit Verification toll-free telephone number at 1-800-772-1213 or visit the SSA's website at www.ssa.gov to request a copy of their SS and/or SSI benefit information; and/or
    c. Send a letter to the SSA local office to request information needed to resolve the discrepancy.

   If the tenant is able to provide proof that the PIC or TRACS data is erroneous, proceed to step 5. Otherwise, continue with step 3.

3. Calculate the amounts of any excess rental assistance the tenant has received applicable to prior re-certifications. HUD does not specify requirements on the maximum timeframe for calculating excess rental assistance owed. However, HUD encourages program administrators to go back as far as the data shown on the Benefit History Reports.

4. Obtain from the tenant immediate restitution for the previously received excess rental assistance that the tenant has received because of unreported or underreported SS/SSI benefits, or a signed agreement to repay the amount of excess rental assistance. Program administrators may also take other administrative actions they deem appropriate under the circumstances.

   Generally, program administrators should take administrative action to recoup prior excess rental assistance that occurs from unreported or underreported income. However, program administrators, in some unique circumstances (e.g., an indigent tenant with no means of repayment), may decide not to pursue retroactive rent for recipients of SS and SSI. Factors to be considered include the following:

   - the extent of abuses;
   - the costs of obtaining information and reexamining the tenant for retroactive rent;
   - the likelihood of collection; and
   - the extent of other abuses by the tenant.

5. Annotate the Tenant Income Discrepancy Report with the resolution of the SS and SSI income difference. The following codes are suggested for use in the annotations:

Code	Description
Resolved with tenant – no enforcement action needed	
1A	Errors in automated tenant data
1B	Interim increase in tenant's income, no increase in the tenant's rent is required until the next re-certification
1C	Tenant vacated unit, no action planned
1D	Regular re-certification conducted, amounts no longer discrepant
Resolved with tenant – enforcement action completed. (More than one code below may be used; an asterisk should be use if the action involves prior year's re-certifications.)	
2A	Tenant's rent increased $______ per month
2B	Repayment agreement $_______ per month
2C	Immediate restitution $_______ in full
2D	Assistance terminated, no restitution likely

Code	Description
2E	Tenant evicted, no restitution likely
2F	Enforcement action pending, appointment with tenant scheduled but not completed
3	Other (explain)

All income discrepancies should be resolved within 60 days, preferably, but not more than 90 days after the receipt of the Income Discrepancy Report from HUD. Exceptions to this general rule may apply where further verification of income with the SSA is necessary.

6. Retain the annotated Tenant Income Discrepancy Report for three years or as indicated by the POA's record retention policies and procedures. The Tenant Income Discrepancy Reports should not be sent to HUD.

Some larger program administrators have chosen to refer the Tenant Income Discrepancy Reports to a Tenant Integrity Unit, or Internal Audit staff for analysis and resolution. The referral of the Tenant Income Discrepancy Reports to an organization/person independent of the person who did the original re-certification is highly desirable. The independent organization can then analyze the report and initiate appropriate administrative actions.